

# EXHIBIT A-1

**CASE: FRANCISCO BELTRAN-CINTRON, et al v. DEPARTMENT OF THE FAMILY, ARV  
and AIJ. CASP NUMBER: 2021-01-0345 (formerly, TPI case K AC 2009-0809)**

1. Joan Almedina Quirindongo

Print full name, including both last names.

RECEIVED

2. 17 BK 3283-LTS

Designated claim number (as indicated in the letter received)

JUN 03 2021

PRIME CLERK LLC

3. I am a claimant in the case of FRANCISCO BELTRAN-CINTRON, et al v. Department of Family, ARV and AU. Case: CASP 2021-01-0345 (formerly TPI case K AC 2009-0809).

4. For the documents that prove my claim, please refer to **CLAIM No. 179140**.

5. \$ 50,000

(Estimated amount of my claim)

6. Since the federal Bankruptcy Code guarantees my right to vote for the confirmation of the fiscal plan, having a valid salary claim, I request that in accordance with Rule 3018 (a), the value of my claim be estimated. Please note that this requirement is easy to fulfill, given that during the proceedings filed in case K AC 2009-0809 the (DF, ARV and NIJ) audited the positions included in the above-referenced lawsuit, and they have all the pertinent information on the estimated value of wages that were withheld in violation of the law and my employment contract. All of this, following the guidelines established by the judgments handed down in the cases of *Carmen Socorro Cruz Hernández et al, v. DF et al*, case No. 1991-0665; *Nilda Agosto et al v. DF*, case num: K PE2005-0608, and *Santiago Declet v. DF*, 153 DPR 208 (2001).

As soon as the provisions of Rule 3018 (a) are complied with and I am notified of the value of my claim, we will submit our proposal for the stipulation of my case.

7. Since the cause of action filed in my case refers to a salary claim that arises within the ordinary course of employment, and where local and federal labor statutes, as well as the provisions of my employment contract were violated, my case should be processed under the "ACR Procedure" so as to make sure that I am guaranteed due process and equal application of the law.

8. For anything related to my case and the above-referenced matter, please communicate with my lawyer: **Ms. Ivonne González Morales, Esq., PO Box 902-1828, San Juan, PR 00902-1828, Telephone: 787- 410-0119; Email: ivonnegm@prw.net.**



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## MEMORANDUM

TO: **ALL PLAINTIFFS CASE FRANCISCO BELTRAN ET AL. V. DEPT OF THE FAMILY, ARV AND AIJ,  
CASE CASP NO. 2021-01-0345**  
**(formerly case no.: (TPI) K AC 2009-0809: TA No. : KLAN 2015-01434 v (TS) AC 2016-0110)**

FROM: **ATTY IVONNE GONZALEZ MORALES**

DATE: **MAY 20, 2021**

SUBJECT: **URGENT - INSTRUCTIONS FOR RESPONDING TO FEDERAL COURT SUBPOENA REQUESTING  
DOCUMENTS TO SUPPORT YOUR WAGE CLAIM - (CONFIDENTIAL)**

We are receiving multiple calls from individuals who have received letters from the federal court requesting them to submit information and documents to establish their wage claim on or before Wednesday, **May 26, 2021**.

For this reason, and to assist you and inform you where you can find the documents that support your wage claim, enclosed is a form that you must complete and return before the deadline to the address indicated in the letter you received.

Be sure to include with your reply: (1) the communication sent to you (two pages) and **SIGN AND WRITE YOUR NAME IN BLOCK PRINT ON THE DOCUMENT** and (2) answer the 3 questions on the form we include. The form will tell you where you can find the documents you are asked to provide. Also indicate the estimated amount you are claiming. To calculate the amount you claim, you should consider your position, years of service and that it is a reasonable amount.

Please be advised that the communication that some plaintiffs have received refers to the "PROOF OF CLAIM", which you filed on your own, before the federal court for 2018 and which is related to the case of Francisco Beltrán Cintrón, to which you belong.

In this case, it was requested that your wages be corrected and that you be paid the wage adjustment to which you are entitled, because the Department of the Family, ARV and AIJ, illegally implemented the federal minimum wage. [NOTE: if you do not remember, you can obtain a copy of the document you filed online, at the PRIME CLERK PROMESA website, by typing in the "designated claim" number, which you were notified of in the letter you received].

On the other hand, please be advised that if you did not receive the letter from PRIME CLERK you should not be worried, as we will soon be filing a Motion before the Federal Court, under RULE 3018 (a) of the Bankruptcy Code. In this motion, we will request an estimate of the amount that corresponds to each claimant, according to their service history, so that they will be allowed to vote to approve or disapprove the proposed tax plan. In this way, and with the help and cooperation of each of you, we will ensure that the Government does not continue to discriminate unfairly in the allocation of your salaries. Together we are more!

### IMPORTANT INSTRUCTIONS:

1. **THE ATTACHED FORM SHOULD ONLY BE USED BY THE PLAINTIFFS IN THE FRANCISCO BELTRAN CINTRON CASE.**
2. **PLAINTIFFS WHO RECEIVED THE LETTER FROM THE FEDERAL COURT MUST RESPOND TO IT.**
3. **THE ATTACHED FORM MUST BE SENT TO THE ADDRESS INDICATED IN THE LETTER YOU RECEIVED FROM THE FEDERAL COURT AND A COPY KEPT FOR YOURSELF.**

SRF 52652

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, THE  
EMPLOYEES RETIREMENT SYSTEM OF THE  
GOVERNMENT OF THE COMMONWEALTH OF  
PUERTO RICO, AND THE PUERTO RICO PUBLIC  
BUILDINGS AUTHORITY,

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS  
(Jointly Administered)

**NOTICE OF FILING OF DISCLOSURE STATEMENT FOR THE THIRD  
AMENDED TITLE III JOINT PLAN OF ADJUSTMENT OF THE  
COMMONWEALTH OF PUERTO RICO, ET AL. AND HEARING THEREON**

PLEASE TAKE NOTICE that, on May 11, 2021, the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as sole representative of the Commonwealth of Puerto Rico (the "Commonwealth"), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS"), and the Puerto Rico Public Buildings Authority ("PBA"), pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* ("PROMESA")<sup>2</sup> (the Oversight Board, in its capacity as sole representative of the Commonwealth, ERS, and PBA, is referred to as the "Debtors"), filed with the United States District Court for the District of Puerto Rico (the "Court"):

(i) the *Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.*, [ECF No. 46740] (as the same may be amended or modified, including all exhibits and attachments thereto, the "Plan"), and

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

- (ii) the *Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.*, [ECF No. 16741] (as the same may be amended or modified, including all exhibits and attachments thereto, the "Disclosure Statement").

**PLEASE TAKE FURTHER NOTICE** that the Debtors intend to present the Disclosure Statement, and any amendments, supplements, changes, or modifications thereto, for approval at a hearing before the Honorable Laura Taylor Swain on **July 13, 2021 at 9:30 a.m. (Atlantic Standard Time)** convened by telephonic hearing through CourtSolutions (the "Disclosure Statement Hearing"). The Disclosure Statement may be amended at any time prior to or at the Disclosure Statement Hearing. The Disclosure Statement Hearing may be adjourned from time to time without further notice, except for the announcement of the adjourned date(s) through the agenda for the Disclosure Statement Hearing and/or at the Disclosure Statement Hearing or any continued hearing(s).

**PLEASE TAKE FURTHER NOTICE** that information relating to the adequacy of the information contained in the Disclosure Statement is available online in the Disclosure Statement Depository at [titleiiiplandataroom.com](http://titleiiiplandataroom.com).

**PLEASE TAKE FURTHER NOTICE** that objections (an "Objection"), if any, to the approval of the Disclosure Statement must:

- (i) be in writing and signed,
- (ii) conform to the Federal Rules of Bankruptcy Procedures and the *Fourteenth Amended Notice, Case Management and Administrative Procedures* [ECF No. 15894-1] (the "Case Management Procedures"),
- (iii) state the name and address of the objector or entity proposing a modification to the Disclosure Statement, and the amount (if applicable) of its claim or nature of its interest in the Debtors' cases,
- (iv) specify the basis and nature of any Objection and set forth the proposed modification to the Disclosure Statement, together with suggested language,
- (v) be filed with the United States District Court, Clerk's Office, 150 Ave. Carlos Chardon Ste. 150, San Juan, P.R. 00918-1767, so as to be received on or before June 15, 2021 at 5:00 p.m. (Atlantic Standard Time) (the "Objection Deadline"), and
- (vi) be served upon the Office of the United States Trustee, Edificio Ochoa, 500 Tanca Street, Suite 301, San Juan, P.R. 00901 (re: *In re Commonwealth of Puerto Rico*) so as to be received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE** that objecting parties that have not filed a timely written Objection will not be permitted to make oral remarks at the Disclosure Statement Hearing.

**PLEASE TAKE FURTHER NOTICE** that copies of the Plan and the Disclosure Statement may be obtained by visiting the website maintained by the Debtors' claims and noticing agent in the PROMESA Title III cases, <https://cases.primeclerk.com/puertorico/>; by sending a request to Prime Clerk LLC, at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available), or by email at [puertoricoinfo@primeclerk.com](mailto:puertoricoinfo@primeclerk.com), or, for a fee, from the Court's website, <https://www.prd.uscourts.gov/>. A PACER login and password are required to access documents on the Court's website, and these can be obtained through the PACER Service Center at [www.pacer.psc.uscourts.gov](http://www.pacer.psc.uscourts.gov). Hard copies of the Plan and the Disclosure Statement are available upon request to the Debtors' claims and noticing agent at the phone number or email address above.

Dated: May 11, 2021  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Brian S. Rosen  
Martin J. Bienenstock (*pro hac vice*)  
Brian S. Rosen (*pro hac vice*)  
**PROSKAUER ROSE LLP**  
Eleven Times Square  
New York, NY 10036

/s/ Hermann D. Bauer  
Hermann D. Bauer  
USDC No. 215205  
**O'NEILL & BORGES LLC**  
250 Muñoz Rivera Ave., Suite 800  
San Juan, PR 00918-1813

*Co-Attorneys for the Financial Oversight and  
Management Board as representative for the  
Debtors*

**ANTE EL TRIBUNAL DE DISTRITO DE LOS ESTADOS UNIDOS  
PARA EL DISTRITO DE PUERTO RICO**

*In re:*

LA JUNTA DE SUPERVISIÓN Y  
ADMINISTRACIÓN FINANCIERA PARA PUERTO  
RICO,

como representante de

EL ESTADO LIBRE ASOCIADO DE PUERTO RICO,  
EL SISTEMA DE RETIRO DE LOS EMPLEADOS  
DEL GOBIERNO DEL ESTADO LIBRE ASOCIADO  
DE PUERTO RICO Y LA AUTORIDAD DE  
EDIFICIOS PÚBLICOS DE PUERTO RICO,

Deudores.<sup>1</sup>

PROMESA

Título III

Núm. 17 BK 3283-LTS

(Administrado Conjuntamente)

**NOTIFICACIÓN DE PRESENTACIÓN DE LA DECLARACIÓN DE DIVULGACIÓN  
PARA EL TERCER PLAN DE AJUSTE CONJUNTO ENMENDADO DEL  
ESTADO LIBRE ASOCIADO DE PUERTO RICO Y OTROS ELABORADO  
CONFORME AL TÍTULO III, Y DE LA CORRESPONDIENTE VISTA**

**OBSÉRVESE QUE** el 11 de mayo de 2021, la Junta de Supervisión y Administración Financiera para Puerto Rico (la "Junta de Supervisión"), como el único representante del Estado Libre Asociado de Puerto Rico (el "ELA"), del Sistema de Retiro de los Empleados del Gobierno del Estado Libre Asociado de Puerto Rico (el "SRE") y de la Autoridad de Edificios Públicos de Puerto Rico (la "AEP"), conforme a la sección 315(b) de la *Ley para la Supervisión, Administración y Estabilidad Económica de Puerto Rico ("PROMESA")*<sup>2</sup> (la Junta de Supervisión, en su capacidad como el único representante del ELA, del SRE y de la AEP, se denominará los

<sup>1</sup> Los Deudores en estos Casos de Título III, junto con el respectivo número de caso de Título III y los últimos cuatro (4) dígitos del número de identificación federal de contribuyente de cada Deudor, en su caso, son i) el Estado Libre Asociado de Puerto Rico (Caso de Quiebra Núm. 17-BK-3283-LTS) (Últimos cuatro dígitos de la identificación federal del contribuyente: 3481); ii) la Corporación del Fondo de Interés Apremiante de Puerto Rico ("COFINA") (Caso de Quiebra Núm. 17-BK-3284-LTS) (Últimos cuatro dígitos de la identificación federal del contribuyente: 8474); iii) la Autoridad de Carreteras y Transportación de Puerto Rico (la "ACT") (Caso de Quiebra Núm. 17-BK-3567-LTS) (Últimos cuatro dígitos de la identificación federal del contribuyente: 3808); iv) el Sistema de Retiro de los Empleados del Gobierno del Estado Libre Asociado de Puerto Rico (el "SRE") (Caso de Quiebra Núm. 17-BK-3566-LTS) (Últimos cuatro dígitos de la identificación federal del contribuyente: 9686); v) la Autoridad de Energía Eléctrica de Puerto Rico (la "AEE") (Caso de Quiebra Núm. 17-BK-4780-LTS) (Últimos cuatro dígitos de la identificación federal del contribuyente: 3747); y vi) la Autoridad de Edificios Públicos de Puerto Rico (la "AEP") (Caso de Quiebra Núm. 19-BK-5523-LTS) (Últimos cuatro dígitos de la identificación federal del contribuyente: 3801) (Los números de los casos de Título III están enumerados como números de casos de quiebra debido a ciertas limitaciones en el programa informático).

<sup>2</sup> PROMESA ha sido codificada en el título 48 U.S.C., §§ 2101-2241.

"Deudores"), presentó ante el Tribunal de Distrito de los Estados Unidos para el Distrito de Puerto Rico (el "Tribunal"):

- (i) el *Tercer Plan de Ajuste Conjunto Enmendado del Estado Libre Asociado de Puerto Rico y otros elaborado conforme al Título III* [ECF núm. 16740] (en su versión enmendada o modificada, incluidos todos sus anexos y documentos adjuntos, el "Plan"), y
- (ii) la *Declaración de Divulgación para el Tercer Plan de Ajuste Conjunto Enmendado del Estado Libre Asociado de Puerto Rico y otros* [ECF núm. 16741] (en su versión enmendada o modificada, incluidos todos sus anexos y documentos adjuntos, la "Declaración de Divulgación").

**OBSÉRVESE ADEMÁS** que los Deudores tienen la intención de presentar la Declaración de Divulgación (con sus correspondientes enmiendas, complementos, cambios o modificaciones) para su aprobación en una vista que se celebre ante su señoría, Laura Taylor Swain, el **13 de julio de 2021, a las 9:30 a.m. (AST)** convocada a través de medios telefónicos utilizando CourtSolutions (la "Vista sobre la Declaración de Divulgación"). La Declaración de Divulgación podrá ser enmendada en cualquier momento antes de que se celebre la Vista sobre la Declaración de Divulgación. La Vista sobre la Declaración de Divulgación podrá ser aplazada en cualquier momento sin notificación previa, salvo que se haya(n) anunciado la(s) fecha(s) aplazada(s) a través de un orden del día para la Vista sobre la Declaración de Divulgación y/o durante la propia Vista sobre la Declaración de Divulgación o cualesquiera vista(s) posterior(es).

**OBSÉRVESE ASIMISMO** que la información sobre la idoneidad del contenido de la Declaración de Divulgación puede consultarse en línea en el siguiente Repositorio de la Declaración de Divulgación: [titleijplandataroom.com](http://titleijplandataroom.com).

**OBSÉRVESE TAMBIÉN** que las objeciones (en adelante, la "Objeción"), si las hubiere, a la aprobación de la Declaración de Divulgación deben:

- (i) constar por escrito y estar firmadas,
- (ii) ajustarse a las Reglas Federales del Procedimiento de Quiebra y los *Procedimientos de Administración de Casos Enmendados* núm. 14 [ECF núm. 15894-1] (los "Procedimientos de Administración de Casos"),
- (iii) contener el nombre y la dirección del objetor o la entidad que proponga alguna modificación de la Declaración de Divulgación, así como el monto (en su caso) de la reclamación o la naturaleza del interés que le asista en relación con los casos de los Deudores,
- (iv) especificar el fundamento y la naturaleza de cualquier Objeción y explicar la modificación propuesta de la Declaración de Divulgación, incluyendo una redacción del lenguaje sugerido a utilizar,

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(v) presentarse ante el Tribunal de Distrito de los Estados Unidos, Secretaría (*Clerk's Office*), avenida de Carlos Chardón Ste. 150, San Juan (Puerto Rico) 00918-1767, para ser recibidas a más tardar el 15 de junio de 2021 a las 5:00 p.m. (AST) (la "Fecha Límite de la Objeción"), y

(vi) notificarse a la Oficina de United States Trustee, Edificio Ochoa, 500, calle Tanca, local 301, San Juan (Puerto Rico) 00901 (asunto: *In re Commonwealth of Puerto Rico*), para ser recibida a más tardar en la Fecha Límite de la Objeción.

**OBSÉRVESE ADEMÁS** que las partes objetantes que no hayan presentado una Objeción dentro de los plazos establecidos no podrán realizar observaciones orales durante la Vista sobre la Declaración de Divulgación.

**Y POR ÚLTIMO, OBSÉRVESE** que se pueden obtener copias del Plan y de la Declaración de Divulgación visitando el sitio web que mantiene el agente de reclamaciones y notificaciones de los Deudores en el marco de los casos de Título III de PROMESA: <https://cases.primeclerk.com/puertorico/>; realizando una solicitud a Prime Clerk LLC llamando a (844) 822-9231 (número gratuito para Estados Unidos y Puerto Rico) o (646) 486-7944 (parte llamadas desde el extranjero), disponible entre las 10:00 a.m. y las 07:00 p.m. (AST) (hablamos: español), o por correo electrónico a [puertoricoinfo@primeclerk.com](mailto:puertoricoinfo@primeclerk.com); también podrá consultar dichos documentos, previo pago de las tasas correspondientes, visitando el sitio web del Tribunal: <https://www.prd.uscourts.gov/>. Necesitará un nombre de usuario y una contraseña de PACER para acceder a los documentos en el sitio web del Tribunal, los cuales se pueden obtener a través de Centro de Servicios de PACER visitando [www.pacer.psc.uscourts.gov](http://www.pacer.psc.uscourts.gov). Hay copias impresas de Plan y de la Declaración de Divulgación disponibles, previa solicitud, a través del agente de reclamaciones y notificaciones de los Deudores utilizando los números de teléfono y la dirección de correo electrónico arriba mencionados.

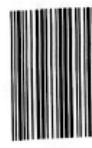
Fecha: 11 de mayo de 2021  
San Juan (Puerto Rico)

Respetuosamente sometida,

*/firma/ Brian S. Rosen*  
Martin J. Bienstock (*pro hac vice*)  
Brian S. Rosen (*pro hac vice*)  
**PROSKAUER ROSE LLP**  
Eleven Times Square  
Nueva York, NY 10036

*/firma/ Hermann D. Bauer*  
Hermann D. Bauer  
USDC núm. 215205  
**O'NEILL & BORGES LLC**  
250 Avenida Muñoz Rivera, local 800  
San Juan, PR 00918-1813  
*Co-abogados de la Junta de Supervisión y  
Administración Financiera como  
representante de los Deudores.*

Joan Almedina Duran Diaz  
Urb. Pedernales del Sur  
44#  
Sta. Isabel, PR 00757



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**T** 718.384.8040  
**W** TargemTranslations.com  
**E** projects@targemtranslations.com  
**A** 185 Clymer St. Brooklyn, NY 11211

### TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)  
TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 34886**

Signed this 17<sup>th</sup> day of August 2021

A handwritten signature in blue ink, appearing to read "Andreea I. Boscor".

Andreea I. Boscor



Verify at [www.atanet.org/verify](http://www.atanet.org/verify)

